

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

-----X Case No.: 24-cv-7064

FRIEDLAND et al.,

Plaintiffs,

-against-

## STIPULATION AND [PROPOSED] ORDER

THE CITY OF NEW YORK, et al.,

Defendants.

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**WHEREAS**, Defendants filed a motion to dismiss on Friday, April 25, 2025 (ECF Nos. 25-28);

**WHEREAS**, Plaintiffs served a safe harbor letter under Fed. R. Civ. P. 11 on Monday, April 28, 2025, pertaining to that motion to dismiss;

**NOW THEREFORE**, it is agreed by and between the undersigned:

1. Defendants waive the benefit of the safe harbor period set by Fed. R. Civ. P. 11(c)(2), and agree Plaintiffs may file a motion for sanctions as a cross-motion to the motion to dismiss, as described in the April 28, 2025 safe harbor letter, at any point after the date of this agreement.
2. The parties agree to submit this agreement, pursuant to Fed. R. Civ. P. 11(c)(2), so that the shortened period in ¶ 1 may be the “another time the court sets” contemplated by Rule 11.

Dated: New York, New York  
May 7, 2025

**COHEN&GREEN P.L.L.C.**

**NYC CITY LAW DEPARTMENT**

By: /s/

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SO ORDERED:

Hon. Denise L. Cote, U.S.D.J.